

Exhibit B

SETTLEMENT CONFERENCE SUMMARYCAPTION: Kleeberg et al. v. Eber et al.DISTRICT COURT JUDGE: Hon. Lewis A. Kaplan JURY / NONJURY
(Circle One)CLAIMS: (1) Breach of Fiduciary Duty; (2) Fraudulent Concealment; (3) Aiding and Abetting
Breach of Fiduciary Duty; (4) Right to an AccountingDEFENSES: (1) Failure to state a cause of action; (2) Statute of Limitations; (3) Waiver, Laches,
and/or Estoppel; (4) Defendants did not breach any fiduciary duty; (5) Unclean Hands;
(6) Failure to Mitigate Damages

RELIEF AVAILABLE UNDER APPLICABLE LAW (WITH APPROPRIATE CITATION):

Equitable relief, compensatory damages, constructive trust, punitive damages (Grau v. Eljay Real
Estate Corp., N.V., 556 N.Y.S.2d 898, 899 (1990), and attorneys' fees (N.Y. Bus. Corp. Law § 626(e))

SUMMARY OF ACTUAL DAMAGES:

Due to Defendants' actions, Plaintiffs' lost their roughly 2/3 combined interests in Eber-Connecticut, a company
valued at between \$4.6 and \$23 million.COUNSEL ATTENDING SETTLEMENT CONFERENCE: PLAINTIFF / DEFENDANT
(Circle One)Name: Brian C. Brook (with associate, Daryoush Behbood)Address: Clinton Brook & Peed, 100 Church St., Fl 8, New York, NY 10007Phone & email: (212) 256-1957, brian@clintonbrook.comClient: Plaintiffs Daniel Kleeberg, Lisa Stein, and Audrey Hays

Name: _____

Address: _____

Phone & email: _____

Client: _____

CLIENT(S) AND/OR CLIENT REPRESENTATIVE(S) ATTENDING SETTLEMENT
CONFERENCE:Daniel KleebergLisa Stein (who also has the proxy to decide for Audrey Hays)

MOTIONS PENDING:

Plaintiffs' Motion to Compel Eber Defendants to Provide Discovery Improperly Withheld on Privilege Grounds.

OTHER RELEVANT MATTERS YOU WISH TO BRING TO THE COURT'S ATTENTION:

Plaintiffs intend to seek leave to amend to plead additional equitable relief sought, after discovering additional corporate self-dealing by Defendants, and likely to add Underberg & Kessler as another Defendant based on facts disclosed just last week.

PRIOR OFFERS / DEMANDS:

Plaintiffs demanded that their ownership interest in Eber-Connecticut be restored and \$1.2 million in cash. Gumaer's estate previously offered \$75,000, but then, today, apparently reduced that offer to \$25,000. The Eber Defendants meanwhile offered to settle for \$50,000, period.

ATTACH SYNOPSIS OF CASE (LIMITED TO 3 PAGES)